

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

WILLIAM LAWRENCE
9072 Nash Lane
North Ridgeville, OH 44039

and

VICTORIA LAWRENCE
9072 Nash Lane
North Ridgeville, OH 44039

Plaintiffs,

v.

NVR, INC.
Plaza America Tower I
11700 Plaza America Drive, Suite 500
Reston, VA 20190

Defendants.

CASE NO.:

JURY TRIAL DEMANDED

**DEFENDANT NVR, INC.'S NOTICE
OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant NVR, Inc. (“NVR”) gives notice of the removal of this action from the Lorain County, Ohio Court of Common Pleas, Case No. 25-CV-216959, to the United States District Court for the Northern District of Ohio, Eastern Division. As ground for removal, NVR states the following:

1. On or about June 23, 2025, Plaintiffs filed an action styled *William Lawrence and Victoria Lawrence v. NVR, Inc.*, bearing Case No. 25-CV-216959 in the Lorain County, Ohio Court of Common Pleas (the “State Action”). NVR was served with the Summons and Complaint for the State Action on June 27, 2025. A copy of the Summons, Complaint, and Notice of Service of Process is attached hereto as **Exhibit A**. To the best of NVR’s knowledge, the attached

documents constitute all process, pleadings, notices, and orders which have been filed in said case today.

2. Without admitting any facts alleged in the Complaint, or that the Complaint states any claim for relief, Plaintiffs purport to bring common law and statutory claims against NVR for certain alleged actions, omissions, and/or wrongdoing involving the sale of a lot and new home to Plaintiffs. Specifically, Plaintiffs assert claims for breach of contract and violation of the Ohio Home Construction Service Suppliers Act, R.C. § 4722, *et seq.* (“HCSSA”).

3. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), as it is filed within 30 days after NVR’s receipt of the Complaint, which is the initial pleading that sets forth the claims for relief upon which this action or proceeding is based.

4. NVR is entitled to remove this action to this Court pursuant to 28 U.S.C. § 1332 because there is complete diversity between the parties: Plaintiffs are residents of Lorain County, Ohio, and NVR is a Virginia Corporation with its principal place of business in the Commonwealth of Virginia.

5. Based on the allegations in the Complaint, Plaintiffs are seeking to recover in this action an amount in excess of \$75,000. In pre-suit correspondence, Plaintiffs claimed to have sustained actual economic damages of at least \$165,500.

6. The HCSSA provides that an owner-claimant may recover actual economic 2nd damages plus an amount not exceeding five thousand dollars in non-economic damages, plus reasonable attorney’s fees. Ohio Rev. Code § 4722.08(A) and (D). Plaintiffs allege entitlement to actual economic damages, non-economic damages of at least \$10,000, and attorney’s fees under the HCSSA. (Complaint, ¶ 70.)

7. Written notice of the filing of this Notice of Removal shall be filed with the Clerk of court of the Lorain County Court of Common Pleas and served on all parties pursuant to 28 U.S.C. § 1446(d).

8. NVR reserves, without admission or waiver herein, all of its defenses to Plaintiffs' Complaint.

Respectfully submitted,

/s/ Ryan W. Gillespie

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Attorneys for Defendant NVR, Inc.

CERTIFICATE OF SERVICE

I certify that on July 11, 2025, a copy of *Defendant NVR, Inc.'s Notice of Removal* was electronically filed via the Court's CM/ECF system. Notice and a copy of this filing will be sent to counsel of record for all parties via the Court's CM/ECF system and by U.S. Regular Mail, with postage prepaid, upon all counsel of record.

/s/ Ryan W. Gillespie
One of the attorneys for Defendant NVR, Inc.